

April 25, 2002

Mike Sweet
Stoutco, Inc.
One Stoutco Drive
Bristol, Indiana 46507

Re: Registered Construction and Operation Status,
139-13700-00550

Dear Mr. Sweet:

The application from Stoutco, Inc., received on January 2, 2001, has been reviewed. Based on the data submitted and the provisions in 326 IAC 2-5.5, it has been determined that the following operation of painting and welding processes for metal trailers and metal lids to metal containers, to be located at One Stoutco Drive, Bristol, Indiana, is classified as registered:

- (a) One (1) large dip tank and exhaust fan, referred to as DT-1, constructed in 1959, with a maximum paint usage of 16.1 lb/hr;
- (b) One (1) spray paint booth, referred to as B-1, constructed in 1971, controlled by dry filters referred to as SB-1, with a maximum paint usage of 9.26 lb/hr.
- (c) One (1) MIG welding area with nine (9) welding stations, referred to as WD-1, with maximum consumption of 1.26 lb/hr; and
- (d) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour [326 IAC 6-2-4]:
 - (1) One (1) 0.125 million British thermal units per hour natural gas-fired residential furnace, referred to as RF-1, and constructed in 1971.
 - (2) One (1) 0.014 million British thermal units per hour natural gas-fired residential furnace, referred to as RF-2, and constructed in 1971.
 - (3) One (1) 0.45 million British thermal units per hour natural gas-fired air make-up unit, referred to as MU-1, and constructed in 1971.
 - (4) Twenty-one (21) 0.1 million British thermal units per hour natural gas-fired radiant heaters, each constructed in 1986.

The following conditions shall be applicable:

1. Pursuant to 326 IAC 2-6 (Emission Reporting), the owner/operator of the source must annually submit an emission statement for the source. The annual statement must be received by April 15 of each year and contain the minimum requirement as specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8)(Emission Statement Operating Year).
2. Pursuant to 326 IAC 5-1-2 (Opacity Limitations) except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following:

- (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
 - (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of 15 minutes (60 readings) in a 6-hour period as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor in a six (6) hour period.
3. Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volatile organic compound (VOC) content of coating applied to metal shall be limited to 3.5 pounds of VOCs per gallon of coating less water, as delivered to the applicator, for forced warm air dried coatings.

Solvent sprayed from application equipment during cleanup or color changes shall be directed into containers. Such containers shall be closed as soon as such solvent spraying is complete, and the waste solvent shall be disposed of in such a manner that evaporation is minimized.

4. Pursuant to 326 IAC 6-3-2 (Process Operations), the PM from the spray booth shall not exceed the PM limitation as calculated using the following equation:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where: } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour.}$$

Pursuant to 326 IAC 6-3-2(c) (Process Operations), the allowable particulate matter emissions rate from the welding area which is not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.

This registration is the first air approval issued to this source. The source may operate according to 326 IAC 2-5.5.

An authorized individual shall provide an annual notice to the Office of Air Quality that the source is in operation and in compliance with this registration pursuant to 326 IAC 2-5.5-4(a)(3)). The annual notice shall be submitted to:

**Compliance Branch
Office of Air Quality
100 North Senate Avenue
P.O. Box 6015
Indianapolis, IN 46206-6015**

no later than March 1 of each year, with the annual notice being submitted in the format attached.

An application or notification shall be submitted in accordance with 326 IAC 2 to the Office of Air Quality (OAQ) if the source proposes to construct new emission units, modify existing emission units, or otherwise modify the source which may increase the potential emission of any criteria pollutant to 25 tons per year or more, or any individual HAP to 10 tons per year or more or any combination of HAPs to 25 tons per year or more, from the equipment covered in this registration. The Permittee shall maintain records to document that VOC emissions are less than 25 tons per year, single HAP emissions are less than 10 tons per year, and combination HAP emissions are less than 25 tons per year.

Sincerely,

Original signed by
Paul Dubenetzky, Chief
Permits Branch
Office of Air Quality

ERG/KC

cc: File - Elkhart County
Elkhart County Health Department
Air Compliance - Greg Winstrom
Northern Regional Office
Permit Tracking - Sara Cloe
Technical Support and Modeling - Michele Boner
Compliance Branch - Karen Nowak

Registration

This form should be used to comply with the notification requirements under 326 IAC 2-5.5-4(a)(3)

Company Name:	Stoutco, Inc.
Address:	One Stoutco Drive
City:	Bristol
Authorized individual:	Mike Sweet
Phone #:	(219) 848-4411
Registration #:	039-13700-00550

I hereby certify that Stoutco, Inc. is still in operation and is in compliance with the requirements of Registration 039-13700-00550.

Name (typed):
Title:
Signature:
Date:

MINOR SOURCE OPERATING PERMIT OFFICE OF AIR QUALITY

**Stoutco, Inc.
One Stoutco Drive
Bristol, Indiana 46507**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the emission units described in Section A (Source Summary) of this permit.

This permit is issued to the above mentioned company under the provisions of 326 IAC 2-1.1, 326 IAC 2-6.1 and 40 CFR 52.780, with conditions listed on the attached pages.

Operation Permit No.: MSOP 039-13700-00550	
Issued by: Original signed by Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: April 25, 2002

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SECTION A

SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-5.1-3(c)] [326 IAC 2-6.1-4(a)]

The Permittee owns and operates a stationary painting and welding process.

Authorized Individual: Mike Sweet
Source Address: One Stoutco Drive, Bristol, IN 46507
Mailing Address: P.O. Box 307, Bristol, IN 46507
Phone Number: (219) 848-4411
SIC Code: 3499
County Location: Elkhart
County Status: Nonattainment for ozone
Attainment area for all other criteria pollutants
Source Status: Minor Source Operating Permit
Minor Source, under PSD or Emission Offset Rules

A.2 Emissions units and Pollution Control Equipment Summary

This stationary source is approved to operate the following emissions units and pollution control devices:

- (a) One (1) large dip tank and exhaust fan, referred to as DT-1, constructed in 1959, with a maximum paint usage of 16.1 lb/hr;
- (b) One (1) spray paint booth, referred to as B-1, constructed in 1971, controlled by dry filters referred to as SB-1, with a maximum paint usage of 9.26 lb/hr;
- (c) One (1) MIG welding area with nine (9) welding stations, referred to as WD-1, with maximum consumption of 1.26 lb/hr; and
- (d) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour [326 IAC 6-2-4]:
 - (1) One (1) 0.125 million British thermal units per hour natural gas-fired residential furnace, referred to as RF-1, and constructed in 1971.
 - (2) One (1) 0.014 million British thermal units per hour natural gas-fired residential furnace, referred to as RF-2, and constructed in 1971.
 - (3) One (1) 0.014 million British thermal units per hour natural gas-fired residential furnace, referred to as RF-3, and constructed in 1971.
 - (4) One (1) 0.45 million British thermal units per hour natural gas-fired air make-up unit, referred to as MU-1, and constructed in 1971.
 - (5) Twenty-one (21) 0.1 million British thermal units per hour natural gas-fired radiant heaters, each constructed in 1986.

THIS SECTION OF THE PERMIT IS BEING ISSUED UNDER THE PROVISIONS OF 326 IAC 2-1.1 AND 40 CFR 52.780, WITH CONDITIONS LISTED BELOW.

B.1 Permit No Defense [IC 13]

This permit to construct does not relieve the Permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.

B.2 Definitions

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, any applicable definitions found in IC 13-11, 326 IAC 1-2, and 326 IAC 2-1.1-1 shall prevail.

B.3 Effective Date of the Permit [IC13-15-5-3]

Pursuant to IC 13-15-5-3, this permit becomes effective upon its issuance.

B.4 Modification to Permit [326 IAC 2]

Notwithstanding the Section B condition entitled "Minor Source Operating Permit", all requirements and conditions of this construction permit shall remain in effect unless modified in a manner consistent with procedures established for modifications of construction permits pursuant to 326 IAC 2 (Permit Review Rules).

B.5 Permit Term [326 IAC 2-6.1-7]

This permit is issued for a fixed term of five (5) years from the original date, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications or amendments of this permit do not affect the expiration

SECTION C

SOURCE OPERATION CONDITIONS

Entire Source

C.1 PSD Minor Source Status [326 IAC 2-2] [40 CFR 52.21]

- (a) The total source potential to emit of all pollutants is less than 250 tons per year. Therefore the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 will not apply.
- (b) Any change or modification which may increase potential to emit to 250 tons per year from this source, shall cause this source to be considered a major source under PSD, 326 IAC 2-2 and 40 CFR 52.21, and shall require approval from IDEM, OAQ prior to making the change.
- (c) Any change or modification which may increase potential to emit to 10 tons per year of any single hazardous air pollutant, twenty-five tons per year of any combination of hazardous air pollutants, or 100 tons per year of any other regulated pollutant from this source, shall cause this source to be considered a major source under Part 70 Permit Program, 326 IAC 2-7, and shall require approval from IDEM, OAQ prior to making the change.

C.2 Preventive Maintenance Plan [326 IAC 1-6-3]

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMP) after issuance of this permit, including the following information on each emissions unit:
 - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions;
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.
- (b) The Permittee shall implement the Preventive Maintenance Plans as necessary to ensure that failure to implement the Preventive Maintenance Plan does not cause or contribute to a violation of any limitation on emissions or potential to emit.
- (c) PMP's shall be submitted to IDEM, OAQ, upon request and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ, may require the Permittee to revise its Preventive Maintenance Plan whenever lack of proper maintenance causes or contributes to any violation.

C.3 Permit Revision [326 IAC 2-5.1-3(e)(3)] [326 IAC 2-6.1-6]

- (a) The Permittee must comply with the requirements of 326 IAC 2-6.1-6 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

Any such application should be certified by the "authorized individual" as defined by 326 IAC 2-1.1-1.

- (c) The Permittee shall notify the OAQ within thirty (30) calendar days of implementing a notice-only change. [326 IAC 2-6.1-6(d)]

C.4 Inspection and Entry [326 IAC 2-5.1-3(e)(4)(B)] [326 IAC 2-6.1-5(a)(4)]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a permitted source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) Have access to and copy, at reasonable times, any records that must be kept under this title or the conditions of this permit or any operating permit revisions;
- (c) Inspect, at reasonable times, any processes, emissions units (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit or any operating permit revisions;
- (d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

C.5 Transfer of Ownership or Operation [326 IAC 2-6.1-6(d)(3)]

Pursuant to [326 IAC 2-6.1-6(d)(3)] :

- (a) In the event that ownership of this source is changed, the Permittee shall notify IDEM, OAQ, Permits Branch, within thirty (30) days of the change.
- (b) The written notification shall be sufficient to transfer the permit to the new owner by an notice-only change pursuant to 326 IAC 2-6.1-6(d)(3).
- (c) IDEM, OAQ, shall issue a revised permit.

The notification which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1.

C.6 Permit Revocation [326 IAC 2-1-9]

Pursuant to 326 IAC 2-1-9(a)(Revocation of Permits), this permit to operate may be revoked for any of the following causes:

- (a) Violation of any conditions of this permit.
- (b) Failure to disclose all the relevant facts, or misrepresentation in obtaining this permit.

- (c) Changes in regulatory requirements that mandate either a temporary or permanent reduction of discharge of contaminants. However, the amendment of appropriate sections of this permit shall not require revocation of this permit.
- (d) Noncompliance with orders issued pursuant to 326 IAC 1-5 (Episode Alert Levels) to reduce emissions during an air pollution episode.
- (e) For any cause which establishes in the judgment of IDEM the fact that continuance of this permit is not consistent with purposes of this article.

C.7 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

C.8 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.

Testing Requirements

C.9 Performance Testing [326 IAC 3-6]

- (a) Compliance testing on new emissions units shall be conducted within 60 days after achieving maximum production rate, but no later than 180 days after initial start-up, if specified in Section D of this approval. All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date. The Permittee shall submit a notice of the actual test date to the above address so that it is received at least two weeks prior to the test date.

- (b) All test reports must be received by IDEM, OAQ within forty-five (45) days after the completion of the testing. An extension may be granted by the IDEM, OAQ, if the source submits to IDEM, OAQ, a reasonable written explanation within five (5) days prior to the end of the initial forty-five (45) day period.

The documentation submitted by the Permittee does not require certification by the "authorized individual" as defined by 326 IAC 2-1.1-1.

Compliance Monitoring Requirements

C.10 Compliance Monitoring [326 IAC 2-1.1-11]

Compliance with applicable requirements shall be documented as required by this permit. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. All monitoring and record keeping requirements not already legally required shall be implemented when operation begins.

C.11 Monitoring Methods [326 IAC 3]

Any monitoring or testing required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, or other approved methods as specified in this permit.

C.12 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 1-6]

- (a) The Permittee is required to implement a compliance monitoring plan to ensure that reasonable information is available to evaluate its continuous compliance with applicable requirements. This compliance monitoring plan is comprised of:
- (1) This condition;
 - (2) The Compliance Determination Requirements in Section D of this permit;
 - (3) The Compliance Monitoring Requirements in Section D of this permit;
 - (4) The Record Keeping and Reporting Requirements in Section C (Monitoring Data Availability, General Record Keeping Requirements, and General Reporting Requirements) and in Section D of this permit; and
 - (5) A Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. CRP's shall be submitted to IDEM, OAQ upon request and shall be subject to review and approval by IDEM, OAQ. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee and maintained on site, and is comprised of :
 - (A) Response steps that will be implemented in the event that compliance related information indicates that a response step is needed pursuant to the requirements of Section D of this permit; and
 - (B) A time schedule for taking such response steps including a schedule for devising additional response steps for situations that may not have been predicted.
- (b) For each compliance monitoring condition of this permit, appropriate response steps shall be taken when indicated by the provisions of that compliance monitoring condition. Failure to perform the actions detailed in the compliance monitoring conditions or failure to take the response steps within the time prescribed in the Compliance Response Plan, shall constitute a violation of the permit unless taking the response steps set forth in the Compliance Response Plan would be unreasonable.
- (c) After investigating the reason for the excursion, the Permittee is excused from taking further response steps for any of the following reasons:

- (1) The monitoring equipment malfunctioned, giving a false reading. This shall be an excuse from taking further response steps providing that prompt action was taken to correct the monitoring equipment.
 - (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied or;
 - (3) An automatic measurement was taken when the process was not operating; or
 - (4) The process has already returned to operating within "normal" parameters and no response steps are required.
- (d) Records shall be kept of all instances in which the compliance related information was not met and of all response steps taken.

Record Keeping and Reporting Requirements

C.13 Malfunctions Report [326 IAC 1-6-2]

Pursuant to 326 IAC 1-6-2 (Records; Notice of Malfunction):

- (a) A record of all malfunctions, including startups or shutdowns of any facility or emission control equipment, which result in violations of applicable air pollution control regulations or applicable emission limitations shall be kept and retained for a period of three (3) years and shall be made available to the Indiana Department of Environmental Management (IDEM), Office of Air Quality(OAQ) or appointed representative upon request.
- (b) When a malfunction of any facility or emission control equipment occurs which lasts more than one (1) hour, said condition shall be reported to OAQ, using the Malfunction Report Forms (2 pages). Notification shall be made by telephone or facsimile, as soon as practicable, but in no event later than four (4) daytime business hours after the beginning of said occurrence.
- (c) Failure to report a malfunction of any emission control equipment shall constitute a violation of 326 IAC 1-6, and any other applicable rules. Information of the scope and expected duration of the malfunction shall be provided, including the items specified in 326 IAC 1-6-2(a)(1) through (6).
- (d) Malfunction is defined as any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner. [326 IAC 1-2-39]

C.14 Annual Emission Statement [326 IAC 2-6]

- (a) The Permittee shall submit an annual emission statement certified pursuant to the requirements of 326 IAC 2-6, that must be received by April 15 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall meet the following requirements:
 - (1) Indicate actual emissions of criteria pollutants from the source, in compliance with 326 IAC 2-6 (Emission Reporting);
 - (2) Indicate actual emissions of other regulated pollutants from the source, for purposes of Part 70 fee assessment.

- (b) The annual emission statement covers the twelve (12) consecutive month time period starting December 1 and ending November 30. The annual emission statement must be submitted to:

Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

- (c) The annual emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

The submittal by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1.

C.15 Monitoring Data Availability [326 IAC 2-6.1-2] [IC 13-14-1-13]

- (a) With the exception of performance tests conducted in accordance with Section C-Performance Testing, all observations, sampling, maintenance procedures, and record keeping, required as a condition of this permit shall be performed at all times the equipment is operating at normal representative conditions.
- (b) As an alternative to the observations, sampling, maintenance procedures, and record keeping of subsection (a) above, when the equipment listed in Section D of this permit is not operating, the Permittee shall either record the fact that the equipment is shut down or perform the observations, sampling, maintenance procedures, and record keeping that would otherwise be required by this permit.
- (c) If the equipment is operating but abnormal conditions prevail, additional observations and sampling should be taken with a record made of the nature of the abnormality.
- (d) If for reasons beyond its control, the operator fails to make required observations, sampling, maintenance procedures, or record keeping, reasons for this must be recorded.
- (e) At its discretion, IDEM may excuse such failure providing adequate justification is documented and such failures do not exceed five percent (5%) of the operating time in any quarter.
- (f) Temporary, unscheduled unavailability of staff qualified to perform the required observations, sampling, maintenance procedures, or record keeping shall be considered a valid reason for failure to perform the requirements stated in (a) above.

C.16 General Record Keeping Requirements [326 IAC 2-6.1-2]

- (a) Records of all required monitoring data and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years and available upon the request of an IDEM, OAQ, representative. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a written request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Records of required monitoring information shall include, where applicable:
- (1) The date, place, and time of sampling or measurements;
 - (2) The dates analyses were performed;

- (3) The company or entity performing the analyses;
 - (4) The analytic techniques or methods used;
 - (5) The results of such analyses; and
 - (6) The operating conditions existing at the time of sampling or measurement.
- (c) Support information shall include, where applicable:
- (1) Copies of all reports required by this permit;
 - (2) All original strip chart recordings for continuous monitoring instrumentation;
 - (3) All calibration and maintenance records;
 - (4) Records of preventive maintenance shall be sufficient to demonstrate that failure to implement the Preventive Maintenance Plan did not cause or contribute to a violation of any limitation on emissions or potential to emit. To be relied upon subsequent to any such violation, these records may include, but are not limited to: work orders, parts inventories, and operator's standard operating procedures. Records of response steps taken shall indicate whether the response steps were performed in accordance with the Compliance Response Plan required by Section C - Compliance Monitoring Plan - Failure to take Response Steps, of this permit, and whether a deviation from a permit condition was reported. All records shall briefly describe what maintenance and response steps were taken and indicate who performed the tasks.
- (d) All record keeping requirements not already legally required shall be implemented when operation begins.

C.17 General Reporting Requirements [326 IAC 2-1.1-11] [326 IAC 2-6.1-2] [IC 13-14-1-13]

- (a) Reports required by conditions in Section D of this permit shall be submitted to:
- Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015
- (b) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (c) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period.

C.18 Annual Notification [326 IAC 2-6.1-5(a)(5)]

- (a) Annual notification shall be submitted to the Office of Air Quality stating whether or not the source is in operation and in compliance with the terms and conditions contained in this permit.

- (b) Noncompliance with any condition must be specifically identified. If there are any permit conditions or requirements for which the source is not in compliance at any time during the year, the Permittee must provide a narrative description of how the source did or will achieve compliance and the date compliance was, or will be, achieved. The notification must be signed by an authorized individual.
- (c) The annual notice shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in the format attached no later than March 1 of each year to:

Compliance Branch, Office of Air Quality
Indiana Department of Environmental Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, IN 46206-6015

- (d) The notification shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

- (a) One (1) large dip tank and exhaust fan, referred to as DT-1, constructed in 1959, with a maximum paint usage of 16.1 lb/hr; and
- (b) One (1) spray paint booth, referred to as B-1, constructed in 1971, controlled by dry filters referred to as SB-1, with a maximum paint usage of 9.26 lb/hr.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.1.1 Volatile Organic Compound (VOC) [326 IAC 8-2-9]

Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volume weighted average volatile organic compound (VOC) content of coating applied to metal shall be limited to 3.5 pounds of VOCs per gallon of coating less water, as delivered to the applicator for any calendar day, for forced warm air dried coatings.

Solvent sprayed from application equipment during cleanup or color changes shall be directed into containers. Such containers shall be closed as soon as such solvent spraying is complete, and the waste solvent shall be disposed of in such a manner that evaporation is minimized.

D.1.2 Particulate Matter (PM) [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2, the PM from the spray booth shall not exceed the PM limitation was calculated using the following equation:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

Compliance Determination Requirements

D.1.3 Particulate Matter (PM)

In order to comply with D.1.2, the dry filters for PM control shall be in operation and control emissions from the spray booth at all times when the spray booth is in operation.

D.1.4 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitations contained in Conditions D.1.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.1.5 Record Keeping Requirements

- (a) To document compliance with Conditions D.1.1, the Permittee shall maintain records in accordance with (1) through (2) below. Records maintained for (1) through (2) shall be taken daily and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.1.1.

- (1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents; and
 - (2) The cleanup solvent usage for each day.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

SECTION D.2

EMISSIONS UNIT OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

- (c) One (1) MIG welding area with nine (9) welding stations, referred to as WD-1, with maximum consumption of 1.26 lb/hr.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards

D.2.1 Particulate Matter (PM) [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Process Operations), the allowable PM emission rate from the welding area shall not exceed 0.029 pounds per hour when operating at a process weight rate of 1.26 pounds per hour.

The pounds per hour limitation was calculated with the following equation:

Interpolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

MINOR SOURCE OPERATING PERMIT ANNUAL NOTIFICATION

Company Name:	Stoutco, Inc.
Address:	One Stoutco Drive
City:	Bristol, IN 46507
Phone #:	(219) 848-4411
MSOP #:	039-13700-00550

I hereby certify that Stoutco, Inc. is	<input type="radio"/> in compliance with the requirements of MSOP 039-13700-00550.
	<input type="radio"/> not in compliance with the requirements of MSOP 039-13700-00550.

Authorized Individual (typed):
Title:
Signature:
Date:

Noncompliance:

Stoutco, Inc.
Bristol, Indiana
Permit Reviewer: ERG/KC

Page 23 of 24
MSOP039-13700-00550

(SIGNATURE IF FAXED)

MALFUNCTION RECORDED BY: _____ DATE: _____ TIME: _____
*SEE PAGE 2

PAGE 1 OF 2

Please note - This form should only be used to report malfunctions applicable to Rule 326 IAC 1-6 and to qualify for the exemption under 326 IAC 1-6-4.

326 IAC 1-6-1 Applicability of rule

Sec. 1. This rule applies to the owner or operator of any facility required to obtain a permit under 326 IAC 2-5.1 or 326 IAC 2-6.1.

326 IAC 1-2-39 "Malfunction" definition

Sec. 39. Any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner.

***Essential services** are interpreted to mean those operations, such as, the providing of electricity by power plants. Continued operation solely for the economic benefit of the owner or operator shall not be sufficient reason why a facility cannot be shutdown during a control equipment shutdown.

If this item is checked on the front, please explain rationale:

April 25, 2002

**Indiana Department of Environmental Management
Office of Air Quality**

Technical Support Document (TSD) for a Registration

Source Background and Description

Source Name: Stoutco, Inc.
Source Location: One Stoutco Drive, Bristol, IN 46507
County: Elkhart
SIC Code: 3499
Operation Permit No.: 039-13700-00550
Permit Reviewer: ERG/KC

The Office of Air Quality (OAQ) has reviewed an application from Stoutco, Inc. relating to the construction and operation of painting and welding processes for metal trailers and metal lids to metal containers.

Permitted Emission Units and Pollution Control Equipment

There are no permitted emission units and pollution control devices operating at this source during this review process.

Unpermitted Emission Units and Pollution Control Equipment

The source also consists of the following unpermitted facilities/units:

- (a) ¹One (1) large dip tank and exhaust fan, referred to as DT-1, constructed in 1959, with a maximum paint usage of 16.1 lb/hr;
- (b) ¹One (1) spray paint booth, referred to as B-1, constructed in 1971, controlled by dry filters referred to as SB-1, with a maximum paint usage of 9.26 lb/hr.
- (c) ²One (1) MIG welding area with nine (9) welding stations, referred to as WD-1, with maximum consumption of 1.26 lb/hr; and
- (d) ²Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour [326 IAC 6-2-4]:
 - (1) One (1) 0.125 million British thermal units per hour natural gas-fired residential furnace, referred to as RF-1, and constructed in 1971.
 - (2) One (1) 0.014 million British thermal units per hour natural gas-fired residential furnace, referred to as RF-2, and constructed in 1971.

- (3) One (1) 0.45 million British thermal units per hour natural gas-fired air make-up unit, referred to as MU-1, and constructed in 1971.
- (4) Twenty-one (21) 0.1 million British thermal units per hour natural gas-fired radiant heaters, each constructed in 1986.

¹ These units have emissions greater than exemption levels and have been constructed and operated without a permit.

² These units have been constructed without a permit, but emissions are below exemption levels.

New Emission Units and Pollution Control Equipment Receiving Prior Approval

There are no new construction activities included in this permit.

Existing Approvals

There are no existing approvals at this source during this review process.

Enforcement Issue

- (a) IDEM is aware that equipment has been constructed or operated prior to receipt of the proper permit. The subject equipment is listed in this Technical Support Document under the condition entitled Unpermitted Emission Units and Pollution Control Equipment.
- (b) IDEM is reviewing this matter and will take appropriate action. This proposed permit is intended to satisfy the requirements of the construction permit rules.

Stack Summary

Stack ID	Operation	Height (feet)	Diameter (feet)	Flow Rate (acfm)	Temperature (°F)
DT-1	Dip tank	11	1.8	7,000	70
SB-1	Spray booth	3	2.5	13,000	70
WD-1	Welding	11	4	Unknown	70
UT-1	Air Make-up unit	8	0.25	1	65
RF-1	Residential furnace	18	0.67	Unknown	190
RF-2	Residential furnace	18	0.67	Unknown	190
RF-3	Residential furnace	18	0.67	Unknown	190

Recommendation

The staff recommends to the Commissioner that the operation be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An application for the purposes of this review was received on January 2, 2001, with additional information received on March 7, 2001, May 3, 2001, June 21, 2001, and August 21, 2001.

Emission Calculations

See Appendix A of this document for detailed emissions calculations (page 1 through 5).

Potential To Emit of Source Before Controls

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as “the maximum capacity of a stationary source or emissions unit to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA, the department, or the appropriate local air pollution control agency.”

Pollutant	Potential To Emit (tons/year)
PM	8.32
PM-10	8.23
SO ₂	0.01
VOC	16.88
CO	1.0
NO _x	1.2

HAPs	Potential To Emit (tons/year)
Xylene	0.02
Cumene	0.02
Ethylbenzene	0.81
Manganese	3.00×10^{-3}
Benzene	2.48×10^{-5}
Dichlorobenzene	1.421×10^{-5}
Formaldehyde	8.879×10^{-4}
Hexane	2.131×10^{-2}
Toluene	4.025×10^{-5}
Lead	5.92×10^{-6}
Cadmium	3.302×10^{-5}
Chromium	1.657×10^{-5}
Nickel	2.486×10^{-5}
TOTAL	0.88

- (a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of criteria pollutants is less than 100 tons per year. Therefore, the source is not subject to the provisions of 326 IAC 2-7.
- (b) The potential to emit (as defined in 326 IAC 2-7-1(29)) of criteria pollutants is less than 25 tons per year. Therefore, the source is not subject to the provisions of 326 IAC 2-6.1.
- (c) The potential to emit (as defined in 326 IAC 2-7-1(29)) of pollutants are greater than levels listed in 326 IAC 2-1.1-3(d)(1), therefore the source is subject to the provisions of 326 IAC 2-5.5.1.

- (d) The potential to emit (as defined in 326 IAC 2-7-1(29)) of any single HAP is less than ten (10) tons per year and/or the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination of HAPs is less than twenty-five (25) tons per year. Therefore, the source is not subject to the provisions of 326 IAC 2-7.
- (e) **Fugitive Emissions**
Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

County Attainment Status

The source is located in Elkhart County.

Pollutant	Status
PM-10	Attainment
SO ₂	Attainment
NO ₂	Attainment
Ozone	Attainment
CO	Attainment
Lead	Attainment

- (a) Volatile organic compounds (VOC) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. Elkhart County has been designated as attainment for ozone.
- (b) Elkhart County has been classified as attainment or unclassifiable for all criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.
- (c) **Fugitive Emissions**
Since this type of operation is not one of the 28 listed source categories under 326 IAC 2-2, 40 CFR 52.21, or 326 IAC 2-3 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

Source Status

Existing Source PSD, Part 70 or FESOP Definition (emissions after controls, based on 8,760 hours of operation per year at rated capacity and/ or as otherwise limited):

Pollutant	Emissions (ton/yr)
PM	8.32
PM10	8.32
SO ₂	0.01
VOC	16.88
CO	1.0
NO _x	1.2

- (a) This existing source is not a major stationary source because no nonattainment regulated pollutant is emitted at a rate of 100 tons per year, and it is not in one of the 28 listed source categories.
- (b) These emissions were based on the operation permit application submitted by Stoutco, Inc.

Part 70 Permit Determination

326 IAC 2-7 (Part 70 Permit Program)

This existing source, including the emissions from this permit 039-13700-00550, is not subject to the Part 70 Permit requirements because the potential to emit (PTE) of:

- (a) each criteria pollutant is less than 100 tons per year,
- (b) a single hazardous air pollutant (HAP) is less than 10 tons per year, and
- (c) any combination of HAPs is less than 25 tons/year.

This status is based on all the air approvals issued to the source. This status has been verified by the OAQ inspector assigned to the source.

Federal Rule Applicability

- (a) There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) applicable to this source.
- (b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 14 and 40 CFR Part 63) applicable to this source.

State Rule Applicability - Entire Source

326 IAC 2-6 (Emission Reporting)

This source is subject to 326 IAC 2-6 (Emission Reporting), because it has the potential to emit more than ten (10) tons per year of VOC and is in Elkhart County. Pursuant to this rule, the owner/operator of the source must annually submit an emission statement for the source. The annual statement must be received by April 15 of each year and contain the minimum requirement as specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8)(Emission Statement Operating Year).

326 IAC 5-1 (Visible Emissions Limitations)

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of forty percent (40%) any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))

The source will emit less than 10 tons per year of a single HAP or 25 tons per year of a combination of HAPs. Therefore, 326 IAC 2-4.1 does not apply.

State Rule Applicability - Dip Tank and Spray Booth

326 IAC 6-3-2 (Process Operations)

Pursuant to 326 IAC 6-3-2, the PM from the spray booth shall not exceed the PM limitation as calculated using the following equation:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67}$$

where: E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour.

326 IAC 8-1-6 (New Facilities; General Reduction Requirements)

326 IAC 8-1-6 (New Facilities; General Reduction Requirements) does not apply to the dip tank or spray booth because both were constructed prior to January 1, 1980.

326 IAC 8-2-9 (Miscellaneous Metal Coating Operations)

326 IAC 8-2-9 (Miscellaneous Metal Coating Operations) applies to this source because the source was existing as of July 1, 1990, is located in Elkhart County, and has actual emission greater than 15 pounds of VOC per day before add-on controls.

Pursuant to the rule, the volatile organic compound (VOC) content of coating applied to metal shall be limited to 3.5 pounds of VOCs per gallon of coating less water, as delivered to the applicator, for forced warm air dried coatings.

Solvent sprayed from application equipment during cleanup or color changes shall be directed into containers. Such containers shall be closed as soon as such solvent spraying is complete, and the waste solvent shall be disposed of in such a manner that evaporation is minimized.

326 IAC 8-6 (Organic Solvent Emission Limitations)

326 IAC 8-6 (Organic Solvent Emission Limitations) does not apply to this source because it is located in Elkhart County and no facilities were constructed after October 7, 1974 and prior to January 1, 1980. Additionally, this source does not have the potential to emit greater than one hundred (100) tons per year of VOC.

State Rule Applicability - Welding Area

326 IAC 6-3-2(c) (Process Operations)

Pursuant to 326 IAC 6-3-2(c), the allowable particulate matter emissions rate from the welding area which is not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.

Conclusion

The operation of this painting and welding process shall be subject to the conditions of the attached proposed Registration 039-13700-00550.

Company Name: Stoutco Inc.

CP: 039-13700

Plt ID: 039-00550

Reviewer: ERG/KC

Date: 02/02/01

Material	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency
Black High Solid Enamel	6.8	49.00%	0.0%	49.0%	0.0%	49.90%	0.18200	5.000	3.33	3.33	3.03	72.66	13.26	2.07	6.67	85%
Aromatic 100	7.3	36.50%	0.0%	36.5%	0.0%	0.00%	0.06000	5.000	2.68	2.68	0.80	19.29	3.52	6.12	ERR	0%

State Potential Emissions	Add worst case coating to all solvents	3.83	91.95	16.78	8.19
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METHODOLOGY

$$\text{Pounds of VOC per Gallon Coating less Water} = (\text{Density (lb/gal)} * \text{Weight \% Organics}) / (1 - \text{Volume \% water})$$
$$\text{Pounds of VOC per Gallon Coating} = (\text{Density (lb/gal)} * \text{Weight \% Organics})$$
$$\text{Potential VOC Pounds per Hour} = \text{Pounds of VOC per Gallon coating (lb/gal)} * \text{Gal of Material (gal/unit)} * \text{Maximum (units/hr)}$$

Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)

Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)

$$\text{Particulate Potential Tons per Year} = (\text{units/hour}) * (\text{gal/unit}) * (\text{lbs/gal}) * (1 - \text{Weight \% Volatiles}) * (1 - \text{Transfer efficiency}) * (8760 \text{ hrs/yr}) * (1 \text{ ton}/2000 \text{ lbs})$$
$$\text{Pounds VOC per Gallon of Solids} = (\text{Density (lbs/gal)} * \text{Weight \% organics}) / (\text{Volume \% solids})$$
$$\text{Total} = \text{Worst Coating} + \text{Sum of all solvents used}$$

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Appendix A: Emission Calculations
HAP Emission Calculations

Company Name: Stoutco Inc.
Address City IN Zip: One Stoutco Drive, P.O. Box 307, Bristol, IN 46507
CP#: 039-13700
Plt ID: 039-00550
Permit Reviewer: ERG/KC
Date: 02/02/01

Material	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Xylene	Weight % Cumene	Weight % Ethylbenzene	Xylene Emissions (ton/yr)	Cumene Emissions (ton/yr)	Ethylbenzene Emissions (ton/yr)
Black High Solid Enamel	6.8	0.18200	5.000	0.06%	0.06%	3.00%	0.02	0.02	0.81
Aromatic 100	7.3	0.06000	5.000	0.00%	0.00%	0.00%	0.00	0.00	0.00

Total State Potential Emissions 0.02 0.02 0.81

Total HAP Emissions (tpy)= 0.8

METHODOLOGY

HAPS emission rate (tons/yr) = Density (lb/gal) * Gal of Material (gal/unit) * Maximum (unit/hr) * Weight % HAP * 8760 hrs/yr * 1 ton/2000 lbs

Appendix A: Emissions Calculations
Welding and Thermal Cutting

Company Name: Stoutco Inc.
Address City IN Zip: One Stoutco Drive, P.O. Box 307, Bristol, IN 46507
CP: 039-13700
Plt ID: 039-00550
Reviewer: ERG/KC
Date: 02/02/01

PROCESS	Number of Stations	Max. electrode consumption per station (lbs/hr)	EMISSION FACTORS* (lb pollutant/lb electrode)				EMISSIONS (lbs/hr)				HAPS (lbs/hr)
			PM = PM10	Mn	Ni	Cr	PM = PM10	Mn	Ni	Cr	
WELDING											
Metal Inert Gas (MIG)(carbon steel)	9	0.14	0.0055	0.0005			0.007	0.001	0.000	0	0.001
EMISSION TOTALS											
Potential Emissions lbs/hr							0.01	0.001			0.001
Potential Emissions lbs/day							0.17	0.015			0.015
Potential Emissions tons/year							0.03	0.003			0.003

METHODOLOGY

*Emission Factors are default values for carbon steel unless a specific electrode type is noted in the Process column.

**Emission Factor for plasma cutting from American Welding Society (AWS). Trials reported for wet cutting of 8 mm thick mild steel with 3.5 m/min cutting speed (at 0.2 g/min emitte

Using AWS average values: (0.25 g/min)/(3.6 m/min) x (0.0022 lb/g)/(39.37 in./m) x (1,000 in.) = 0.0039 lb/1,000 in. cut, 8 mm thick

Plasma cutting emissions, lb/hr: (# of stations)(max. cutting rate, in./min.)(60 min./hr.)(emission factor, lb. pollutant/1,000 in. cut, 8 mm thick)

Cutting emissions, lb/hr: (# of stations)(max. metal thickness, in.)(max. cutting rate, in./min.)(60 min./hr.)(emission factor, lb. pollutant/1,000 in. cut, 1" thick)

Welding emissions, lb/hr: (# of stations)(max. lbs of electrode used/hr/station)(emission factor, lb. pollutant/lb. of electrode used)

Emissions, lbs/day = emissions, lbs/hr x 24 hrs/day

Emissions, tons/yr = emissions, lb/hr x 8,760 hrs/year x 1 ton/2,000 lbs.

Welding and other flame cutting emission factors are from an internal training session document.

Refer to AP-42, Chapter 12.19 for additional emission factors for welding.

Natural Gas Combustion Only

MM BTU/HR <100

Small Industrial Boiler

Company Name: Stoutco Inc.

Address City IN Zip: One Stoutco Drive, P.O. Box 307, Bristol, IN 46507

CP: 039-13700

Plt ID: 039-00550

Reviewer: ERG/KC

Date: 02/02/01

Heat Input Capacity
MMBtu/hrPotential Throughput
MMCF/yr

2.7

23.7

Pollutant

Emission Factor in lb/MMCF	PM*	PM10*	SO2	NOx	VOC	CO
	7.6	7.6	0.6	100.0 **see below	5.5	84.0
Potential Emission in tons/yr	0.1	0.1	0.01	1.2	0.1	1.0

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.

**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Methodology

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu

Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 3/98)

Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

Note: Check the applicable rules and test methods for PM and PM10 when using the above emission factors to confirm that the correct factor is used (i.e., condensable included/not included).

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Appendix A: Emissions Calculations

Natural Gas Combustion Only

MM BTU/HR <100

Small Industrial Boiler

HAPs Emissions

Company Name: Stoutco Inc.

Address City IN Zip: One Stoutco Drive, P.O. Box 307, Bristol, IN 46507

CP: 039-13700

Plt ID: 039-00550

Reviewer: ERG/KC

Date: 02/02/01

HAPs - Organics

Emission Factor in lb/MMcf	Benzene 2.1E-03	Dichlorobenzene 1.2E-03	Formaldehyde 7.5E-02	Hexane 1.8E+00	Toluene 3.4E-03
Potential Emission in tons/yr	2.486E-05	1.421E-05	8.879E-04	2.131E-02	4.025E-05

HAPs - Metals

Emission Factor in lb/MMcf	Lead 5.0E-04	Cadmium 1.1E-03	Chromium 1.4E-03	Manganese 3.8E-04	Nickel 2.1E-03
Potential Emission in tons/yr	5.920E-06	1.302E-05	1.657E-05	4.499E-06	2.486E-05

Methodology is the same as page 1.

The five highest organic and metal HAPs emission factors are provided above.

Additional HAPs emission factors are available in AP-42, Chapter 1.4.

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